



Joseph H. Mizrahi – Attorney
300 Cadman Plaza W, 12th Floor
Brooklyn, NY 11201
P: 929-575-4175 | F: 929-575-4195
E: joseph@cml.legal | W: cml.legal

May 6, 2020

Application for adjournment GRANTED. The Initial Pretrial Conference previously set for May 12, 2020 is ADJOURNED sine die. Plaintiff shall file any motion for default judgment no later than June 15, 2020.

VIA ECF

Hon. Judge Liman
United States District Judge
Southern District of New York
50 Pearl Street
New York, NY 10007

Plaintiff is further directed to the Court's Individual Practices in Civil Cases, Exhibit A, available at <https://nysd.uscourts.gov/hon-lewis-j-liman>. The Court's Default Judgment Procedure advises, among other requirements, that "[a] plaintiff seeking a default judgment should *not* proceed by order to show cause."

5/6/2020

Re: Cruz v. Hermes Group, LLC .: Case No. 1:20-cv-01262-LJL

LEWIS J. LIMAN
United States District Judge

Dear Judge Liman,

The undersigned represents Plaintiff Shael Cruz (hereinafter "Plaintiff") in the above-referenced matter.

The initial conference for this matter is set for Tuesday, May 12, 2020 at 3:00 p.m. It is now May 6, 2020, and Defendant has yet to appear. Defendant's answer was due March 13, 2020. Plaintiff is in the process of obtaining a Certificate of Default from the Clerk of the Court as to Defendant, Hermes Group, LLC and will promptly be moving the Court for a Default Judgment in accordance with its Individual Rules.

In light of the above, the undersigned requests that the May 12th Conference be adjourned sine die, and further requests that Plaintiff be granted an additional 30 days in which to both obtain said Certificate of Default and present the Court with an Order to Show Cause for default judgment.

Thank you for your time and consideration of the above request.

Respectfully submitted,

/s/ Joseph H. Mizrahi
Joseph H. Mizrahi, Esq.